

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

William R. Hall, Jr., individually)	
and as a representative of the classes,)	
)	
Plaintiff,)	
v.)	No. 1:18-cv-05141-JPB-AJB
)	
TransUnion Rental Screening)	
Solutions, Inc.)	
Defendant.)	

**JOINT STATUS REPORT AND MOTION REGARDING
SUSPENSION OF CERTAIN DEADLINES**

Plaintiff William R. Hall, Jr. (“Plaintiff”) and Defendant TransUnion Rental Screening Solutions, Inc. (“Defendant”) provide the following status report to the Court pursuant to the Court’s December 13, 2019 order suspending certain deadlines ([ECF No. 69](#)), and respectfully move for entry of an order continuing the suspension of the deadlines for expert discovery and the filing of Plaintiff’s Rule 23 motion for class certification.

1. As the parties informed the Court in their last Joint Report, [ECF No. 74](#), they agreed that Plaintiff would again depose the employee of Defendant who was primarily responsible for the data sample export, and meet and confer regarding a further sample. The parties have done that, and this week Defendant

produced to Plaintiff a data sample resulting from a review of one week of data from two of Defendant's products.

2. The parties have reviewed this additional data sample, and conducted further discussions.

3. However, the parties need more time to work out the precise scope of the data export to be produced, as well as for Plaintiff to consider Defendant's proposal for discovery cost-sharing.

4. Accordingly, the parties jointly request that the deadlines for expert reports and for Plaintiff's motion for class certification continue to be suspended.

5. The parties further request that they be granted leave to file an additional status report and propose new deadlines for filing of a motion to compel and/or motion for protective order (if necessary), class certification motion practice and expert disclosures on or before April 20, 2020. (A proposed order is attached.)

Dated: March 13, 2020

Respectfully submitted,

/s/ Joseph C. Hashmall

/s/ Michael O'Neil (by permission)

E. Michelle Drake, SBN 229202
Joseph C. Hashmall (*pro hac vice*)
BERGER MONTAGUE PC
43 SE Main St., Suite 505
Minneapolis, MN 55414
T: (612) 594-5999

Robert B. Remar, SBN 600575
Joshua P. Gunnemann, SBN 152250
Cameron B. Roberts, SBN 599839
ROGERS & HARDIN LLP
229 Peachtree Street, N.E.
2700 International Tower

F: (612) 584-4470
emd Drake@bm.net
jhashmall@bm.net

Gary B. Andrews, Jr., SBN 019375
Blake Andrews Law Firm, LLC
1831 Timothy Dr.
Atlanta, GA 30329
T: (770) 828-6225
blake@blakeandrewslaw.com

Counsel for Plaintiff

Atlanta, GA 30303
T: (404) 522-4700
F: (404) 525-2224
rremar@rh-law.com
jgunnemann@rh-law.com
croberts@rh-law.com

Michael O'Neil (*pro hac vice*)
Albert E. Hartmann (*pro hac vice*)
REED SMITH LLP
10 South Wacker Drive, 40th Fl.
Chicago, IL 60606
T: (312) 20701000
Michael.oneil@reedsmith.com
ahartmann@reedsmith.com

Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on March 13, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all counsel of record.

/s/ Joseph C. Hashmall

E. Michelle Drake, SBN 229202
Joseph C. Hashmall (*pro hac vice*)
BERGER MONTAGUE PC
43 SE Main St, Suite 505
Minneapolis, MN 55414
Tel.: 612.594.5999
Fax: 612.584.4470
Email: emdrake@bm.net
jhashmall@bm.net

Gary B. Andrews, Jr., SBN 019375
Blake Andrews Law Firm, LLC
1831 Timothy Dr.
Atlanta, GA 30329
Tel.: 770.828.6225
Email: blake@blakeandrewslaw.com

Counsel for Plaintiff